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Management II, L.P.

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

KEITH THOMAS, RICHARD HAYES, HERB
SMITH, and OKLAHOMA POLICE PENSION &
RETIREMENT SYSTEM,

Plaintiffs,

v.

MAGNACHIP SEMICONDUCTOR CORP. SANG
PARK, TAE YOUNG HWANG, MARGARET
SAKAI, R. DOUGLAS NORBY, ILBOK LEE,
NADER TAVAKOLI, RANDAL KLEIN,
MICHAEL ELKINS, AVENUE CAPITAL
MANAGEMENT II, L.P., BARCLAYS CAPITAL
INC., DEUTSCHE BANK SECURITIES INC.,
CITIGROUP GLOBAL MARKETS INC., UBS
SECURITIES LLC and NEEDHAM & COMPANY,
LLC,

Defendants.

CASE NO.: 3:14-cv-01160-JST

**STIPULATION REGARDING
PROTECTIVE ORDER ON
CONFIDENTIALITY**

WHEREAS, on February 8, 2016, this Court entered a Stipulated Protective
Order on Confidentiality ("Protective Order"), ECF No. 187, to which Lead Plaintiff and
MagnaChip Semiconductor Corp. were signatories;

WHEREAS, Avenue Capital Management II, L.P. ("Avenue") was not a
signatory to the Protective Order;

WHEREAS, Lead Plaintiff and Avenue agree that the terms of the Protective Order should apply to all discovery in this matter between Lead Plaintiff and Avenue;

IT IS THEREFORE STIPULATED THAT:

All discovery in this matter between Lead Plaintiff and Avenue shall be governed by, and conducted pursuant to, the terms of the Protective Order.

Dated: April 11, 2016

POMERANTZ LLP

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/s/ John C. Murphy

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17 *Additional Counsel for the Class*

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21 **CERTIFICATION OF CONCURRENCE FROM OTHER PARTIES**

22
23 I, John C. Murphy, am the ECF User whose ID and password are being used to file this
24 STIPULATION REGARDING PROTECTIVE ORDER ON CONFIDENTIALITY. In
25 compliance with Civil L.R. 5-1(i)(3), I hereby attest that the other signatory has concurred in this
26 filing.

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John C. Murphy

IT IS SO ORDERED.

Dated: April 11, 2016


Honorable Jon S. Vigor
United States District Judge